

# GHAJAR EXHIBIT 12

1 Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
2 Mohammed A. Rathur (pro hac vice)  
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**& SPRENGEL LLP**  
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asweatman@caffertyclobes.com  
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*Counsel for Individual and Representative Plaintiffs and*  
7 *the Proposed Class*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**  
12

13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
corporation,

18 Defendant.  
19

Case No. 3:23-cv-03417-VC

PLAINTIFF TA-NEHISI COATES'S  
RESPONSES TO DEFENDANT'S FOURTH  
SET OF INTERROGATORIES

1 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
 2 separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal  
 3 Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the  
 4 needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that  
 5 will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the  
 6 disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
 7 seeks documents and information over which Defendant has equal or greater possession, custody,  
 8 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
 9 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
 10 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
 11 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests  
 12 for Production No. 77.

13 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
 14 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
 15 this interrogatory.

16 **INTERROGATORY NO. 24:**

17 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
 18 the possibility of licensing (via collective license, blanket license, individual license, or any other  
 19 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

20 **RESPONSE TO INTERROGATORY NO. 24:**

21 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
 22 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First  
 23 Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory  
 24 requests information about third-parties. Plaintiff will limit his answer to his own conduct, not the  
 25 conduct of others.

26 Subject to and without waiving these and the general objections, based on Plaintiff's  
 27 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
 28 parties regarding licensing his Asserted Works for use in training LLMs.

not respond to this Interrogatory.

**INTERROGATORY NO. 27:**

Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether YOU contend it is a factual or creative work, and the target audience for the work.

**RESPONSE TO INTERROGATORY NO. 27:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

By: /s/ Mohammed A. Rathur

Mohammed A. Rathur

Bryan L. Clobes (pro hac vice)

Alexander J. Sweatman (pro hac vice)

Mohammed A. Rathur (pro hac vice)

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[mrathur@caffertyclobes.com](mailto:mrathur@caffertyclobes.com)

**VERIFICATION**

My name is Ta-Nehisi Coates. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF TA-NEHISI COATES'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on 11/18/2024.



Ta-Nehisi Coates

1 Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
2 Mohammed A. Rathur (pro hac vice)  
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*Counsel for Individual and Representative Plaintiffs and*  
7 *the Proposed Class*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12  
13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
corporation,

18 Defendant.  
19

Case No. 3:23-cv-03417-VC

PLAINTIFF JUNOT DIAZ'S RESPONSES TO  
DEFENDANT'S FOURTH SET OF  
INTERROGATORIES

1 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
 2 separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal  
 3 Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the  
 4 needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that  
 5 will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the  
 6 disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
 7 seeks documents and information over which Defendant has equal or greater possession, custody,  
 8 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
 9 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
 10 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
 11 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests  
 12 for Production No. 77.

13 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
 14 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
 15 this interrogatory.

16 **INTERROGATORY NO. 24:**

17 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
 18 the possibility of licensing (via collective license, blanket license, individual license, or any other  
 19 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

20 **RESPONSE TO INTERROGATORY NO. 24:**

21 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
 22 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First  
 23 Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory  
 24 requests information about third-parties. Plaintiff will limit his answer to his own conduct, not the  
 25 conduct of others.

26 Subject to and without waiving these and the general objections, based on Plaintiff's  
 27 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
 28 parties regarding licensing his Asserted Works for use in training LLMs.

not respond to this Interrogatory.

**INTERROGATORY NO. 27:**

Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether YOU contend it is a factual or creative work, and the target audience for the work.

**RESPONSE TO INTERROGATORY NO. 27:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

By: /s/ Mohammed A. Rathur

Mohammed A. Rathur

Bryan L. Clobes (pro hac vice)

Alexander J. Sweatman (pro hac vice)

Mohammed A. Rathur (pro hac vice)

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**VERIFICATION**

My name is Junot Diaz. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF JUNOT DIAZ'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on 11/15/2024.



---

Junot Diaz

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Proposed Class Counsel and Counsel for Plaintiff  
Christopher Farnsworth

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative  
Plaintiffs,

v.

Case No. 3:23-cv-03417-VC

PLAINTIFF CHRISTOPHER  
FARNSWORTH'S RESPONSES TO  
DEFENDANT'S FIRST SET OF  
INTERROGATORIES

1 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
2 separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal  
3 Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the  
4 needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that  
5 will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the  
6 disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
7 seeks documents and information over which Defendant has equal or greater possession, custody,  
8 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
9 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
10 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
11 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests  
12 for Production No. 77.

13 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
14 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
15 this interrogatory.

16 **INTERROGATORY NO. 24:**

17 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
18 the possibility of licensing (via collective license, blanket license, individual license, or any other  
19 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

20 **RESPONSE TO INTERROGATORY NO. 24:**

21 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
22 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First  
23 Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory  
24 requests information about third-parties. Plaintiff will limit his answer to his own conduct, not the  
25 conduct of others.

26 Subject to and without waiving these and the general objections, based on Plaintiff's  
27 preliminary investigation, Plaintiff has not entered into any negotiations with any third-parties  
28 regarding licensing his Asserted Work for use in training LLMs.

1 Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will  
2 not respond to this Interrogatory.

3 **INTERROGATORY NO. 27:**

4 Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether  
5 YOU contend it is a factual or creative work, and the target audience for the work.

6 **RESPONSE TO INTERROGATORY NO. 27:**

7 The parties have not reached agreement, nor has the Court ordered additional  
8 Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will  
9 not respond to this Interrogatory.

10 **INTERROGATORY NO. 28:**

11 State the total revenue that YOU (including any entity or company owned, operated, or  
12 controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues  
13 earned from sales and licensing of the works.

14 **RESPONSE TO INTERROGATORY NO. 28:**

15 The parties have not reached agreement, nor has the Court ordered additional  
16 Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will  
17 not respond to this Interrogatory.

18  
19  
20 Dated: November 18, 2024

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Rachel Geman

Rachel Geman

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

250 Hudson Street, 8th Floor

New York, NY 10013-1413

Telephone: 212.355.9500

Facsimile: 212.355.959

Email: rgeman@lchb.com

**VERIFICATION**

I, Christopher Farnsworth, understand the contents of the foregoing Responses to Defendant's First Set of Interrogatories.

I declare under penalty of perjury and that the Responses to these Interrogatories are true and correct to the best of my present knowledge.

Executed on November 15, 2024, in Los Angeles, California.

A handwritten signature in black ink, appearing to be 'CF', is written over a horizontal line.

Christopher Farnsworth

**BOIES SCHILLER FLEXNER LLP**

David Boies (*pro hac vice*)  
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**JOSEPH SAVERI LAW FIRM, LLP**

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Christopher K.L. Young (SBN 318371)  
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jsaveri@saverilawfirm.com  
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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel included below]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Related Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S FOURTH SET OF  
INTERROGATORIES**

**RESPONSE TO INTERROGATORY NO. 23:**

Plaintiff objects to this Interrogatory to the extent that it is compound, premature, requests information over which Defendant has custody or control, and is duplicative. Each subpart is a separate Interrogatory, each of which counts separately toward Defendant's limit under the Federal Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory seeks documents and information over which Defendant has equal or greater possession, custody, and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use. Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests for Production No. 77.

Subject to and without waiving these and the general objections, Plaintiff is not obligated to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding this interrogatory.

**INTERROGATORY NO. 24:**

IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed the possibility of licensing (via collective license, blanket license, individual license, or any other licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

**RESPONSE TO INTERROGATORY NO. 24:**

Plaintiff objects to this Interrogatory to the extent it overbroad and duplicative. Plaintiff objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's Request for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory requests information about third-parties. Plaintiff will limit his answer to his own conduct, not the conduct of others. Plaintiff also objects to this request as unduly burdensome insofar it has no time

1 limitation.

2 Subject to and without waiving these and the general objections, based on Plaintiff's  
3 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
4 parties regarding licensing his Asserted Work for use in training generative AI.

5 **INTERROGATORY NO. 25:**

6 State all facts supporting any contention by YOU that the amount and substantiality of the  
7 portion of YOUR ASSERTED WORKS that was allegedly copied by Meta was not reasonable in  
8 relation to the purpose of training the META AI LLMs.

9 **RESPONSE TO INTERROGATORY NO. 25:**

10 Plaintiff objects to this Interrogatory to the extent that it is compound, premature, requests  
11 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
12 separate Interrogatory, each of which counts separately toward Defendant's limit under the  
13 Federal Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to  
14 the needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response  
15 that will be the subject of expert discovery and objects to the extent that this Interrogatory seeks  
16 the disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
17 seeks documents and information over which Defendant has equal or greater possession, custody,  
18 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
19 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
20 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
21 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's Request for  
22 Production No. 77.

23 Subject to and without waiving these and the general objections, Plaintiff is not obligated to  
24 and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding this  
25 interrogatory.



Dated: November 18, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

**BOIES SCHILLER FLEXNER LLP**

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Chicago, IL 60603  
(312) 782-4880  
bclobes@caffertyclobes.com

[continued on next page]

**VERIFICATION**

My name is Christopher Golden. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF CHRISTOPHER GOLDEN'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on the <sup>15</sup> day of November, 2024.

DocuSigned by:

*Christopher Golden*

30060E607AA7420...

Christopher Golden

1 Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
2 Mohammed A. Rathur (pro hac vice)  
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6 mrathur@caffertyclobes.com  
*Counsel for Individual and Representative Plaintiffs and*  
7 *the Proposed Class*

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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12  
13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
corporation,

18 Defendant.  
19

Case No. 3:23-cv-03417-VC

PLAINTIFF ANDREW SEAN GREER'S  
RESPONSES TO DEFENDANT'S FOURTH  
SET OF INTERROGATORIES

1 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
 2 separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal  
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 8 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
 9 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
 10 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
 11 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests  
 12 for Production No. 77.

13 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
 14 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
 15 this interrogatory.

16 **INTERROGATORY NO. 24:**

17 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
 18 the possibility of licensing (via collective license, blanket license, individual license, or any other  
 19 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

20 **RESPONSE TO INTERROGATORY NO. 24:**

21 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
 22 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First  
 23 Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory  
 24 requests information about third-parties. Plaintiff will limit his answer to his own conduct, not the  
 25 conduct of others.

26 Subject to and without waiving these and the general objections, based on Plaintiff's  
 27 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
 28 parties regarding licensing his Asserted Works for use in training LLMs.

not respond to this Interrogatory.

**INTERROGATORY NO. 27:**

Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether YOU contend it is a factual or creative work, and the target audience for the work.

**RESPONSE TO INTERROGATORY NO. 27:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

By: /s/ Mohammed A. Rathur

Mohammed A. Rathur

Bryan L. Clobes (pro hac vice)

Alexander J. Sweatman (pro hac vice)

Mohammed A. Rathur (pro hac vice)

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& SPRENGEL LLP**

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[mrathur@caffertyclobes.com](mailto:mrathur@caffertyclobes.com)

**VERIFICATION**

My name is Andrew Sean Greer. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF ANDREW SEAN GREER'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on 11/16/2024.



---

Andrew Sean Greer

1 Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
2 Mohammed A. Rathur (pro hac vice)  
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3 **& SPRENGEL LLP**  
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asweatman@caffertyclobes.com  
6 mrathur@caffertyclobes.com  
*Counsel for Individual and Representative Plaintiffs and*  
7 *the Proposed Class*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12  
13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
corporation,

18 Defendant.  
19

Case No. 3:23-cv-03417-VC

PLAINTIFF DAVID HENRY HWANG'S  
RESPONSES TO DEFENDANT'S FOURTH  
SET OF INTERROGATORIES

information over which Defendant has custody or control, and is duplicative. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory seeks documents and information over which Defendant has equal or greater possession, custody, and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use. Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests for Production No. 77.

Subject to and without waiving these and the general objections, Plaintiff is not obligated to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding this interrogatory.

**INTERROGATORY NO. 24:**

IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed the possibility of licensing (via collective license, blanket license, individual license, or any other licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

**RESPONSE TO INTERROGATORY NO. 24:**

Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory requests information about third-parties. Plaintiff will limit his answer to his own conduct, not the conduct of others.

Subject to and without waiving these and the general objections, based on Plaintiff's preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-parties regarding licensing his Asserted Works for use in training LLMs.



not respond to this Interrogatory.

**INTERROGATORY NO. 27:**

Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether YOU contend it is a factual or creative work, and the target audience for the work.

**RESPONSE TO INTERROGATORY NO. 27:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

By: /s/ Mohammed A. Rathur

Mohammed A. Rathur

Bryan L. Clobes (pro hac vice)

Alexander J. Sweatman (pro hac vice)

Mohammed A. Rathur (pro hac vice)

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[mrathur@caffertyclobes.com](mailto:mrathur@caffertyclobes.com)

**VERIFICATION**

My name is David Henry Hwang. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF DAVID HENRY HWANG'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on 11/15/2024.

*David Henry Hwang*

David Henry Hwang

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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel included below]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Related Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S FOURTH SET OF  
INTERROGATORIES**

**RESPONSE TO INTERROGATORY NO. 23:**

Plaintiff objects to this Interrogatory to the extent that it is compound, premature, requests information over which Defendant has custody or control, and is duplicative. Each subpart is a separate Interrogatory, each of which counts separately toward Defendant's limit under the Federal Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory seeks documents and information over which Defendant has equal or greater possession, custody, and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use. Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests for Production No. 77.

Subject to and without waiving these and the general objections, Plaintiff is not obligated to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding this interrogatory.

**INTERROGATORY NO. 24:**

IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed the possibility of licensing (via collective license, blanket license, individual license, or any other licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

**RESPONSE TO INTERROGATORY NO. 24:**

Plaintiff objects to this Interrogatory to the extent it overbroad and duplicative. Plaintiff objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's Request for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory requests information about third-parties. Plaintiff will limit his answer to his own conduct, not the conduct of others. Plaintiff also objects to this request as unduly burdensome insofar it has no time

1 limitation.

2 Subject to and without waiving these and the general objections, based on Plaintiff's  
3 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
4 parties regarding licensing his Asserted Work for use in training generative AI.

5 **INTERROGATORY NO. 25:**

6 State all facts supporting any contention by YOU that the amount and substantiality of the  
7 portion of YOUR ASSERTED WORKS that was allegedly copied by Meta was not reasonable in  
8 relation to the purpose of training the META AI LLMs.

9 **RESPONSE TO INTERROGATORY NO. 25:**

10 Plaintiff objects to this Interrogatory to the extent that it is compound, premature, requests  
11 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
12 separate Interrogatory, each of which counts separately toward Defendant's limit under the  
13 Federal Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to  
14 the needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response  
15 that will be the subject of expert discovery and objects to the extent that this Interrogatory seeks  
16 the disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
17 seeks documents and information over which Defendant has equal or greater possession, custody,  
18 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
19 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
20 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
21 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's Request for  
22 Production No. 77.

23 Subject to and without waiving these and the general objections, Plaintiff is not obligated to  
24 and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding this  
25 interrogatory.

Dated: November 18, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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[continued on next page]

**VERIFICATION**

My name is Richard Kadrey. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF RICHARD KADREY'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on the 15<sup>th</sup> day of November, 2024.

Richard Kadrey

Signed by:

*Richard Kadrey*

182881A504AB4E4...

1 Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
2 Mohammed A. Rathur (pro hac vice)  
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**& SPRENGEL LLP**  
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6 mrathur@caffertyclobes.com  
*Counsel for Individual and Representative Plaintiffs and*  
7 *the Proposed Class*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**  
12

13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
corporation,

18 Defendant.  
19

Case No. 3:23-cv-03417-VC

PLAINTIFF MATTHEW KLAM'S  
RESPONSES TO DEFENDANT'S FOURTH  
SET OF INTERROGATORIES



1 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
 2 separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal  
 3 Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the  
 4 needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that  
 5 will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the  
 6 disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
 7 seeks documents and information over which Defendant has equal or greater possession, custody,  
 8 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
 9 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
 10 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
 11 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests  
 12 for Production No. 77.

13 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
 14 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
 15 this interrogatory.

16 **INTERROGATORY NO. 24:**

17 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
 18 the possibility of licensing (via collective license, blanket license, individual license, or any other  
 19 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

20 **RESPONSE TO INTERROGATORY NO. 24:**

21 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
 22 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First  
 23 Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory  
 24 requests information about third-parties. Plaintiff will limit his answer to his own conduct, not the  
 25 conduct of others.

26 Subject to and without waiving these and the general objections, based on Plaintiff's  
 27 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
 28 parties regarding licensing his Asserted Works for use in training LLMs.

not respond to this Interrogatory.

**INTERROGATORY NO. 27:**

Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether YOU contend it is a factual or creative work, and the target audience for the work.

**RESPONSE TO INTERROGATORY NO. 27:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

By: /s/ Mohammed A. Rathur

Mohammed A. Rathur

Bryan L. Clobes (pro hac vice)

Alexander J. Sweatman (pro hac vice)

Mohammed A. Rathur (pro hac vice)

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[mrathur@caffertyclobes.com](mailto:mrathur@caffertyclobes.com)

**VERIFICATION**

My name is Matthew Klam. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF MATTHEW KLAM'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on 11/16/2024.

*Matthew Klam*

Matthew Klam

1 Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
2 Mohammed A. Rathur (pro hac vice)  
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**& SPRENGEL LLP**  
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6 mrathur@caffertyclobes.com  
*Counsel for Individual and Representative Plaintiffs and*  
7 *the Proposed Class*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12  
13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
corporation,

18 Defendant.  
19

Case No. 3:23-cv-03417-VC

PLAINTIFF LAURA LIPPMAN'S  
RESPONSES TO DEFENDANT'S FOURTH  
SET OF INTERROGATORIES

1 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
 2 separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal  
 3 Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the  
 4 needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that  
 5 will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the  
 6 disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
 7 seeks documents and information over which Defendant has equal or greater possession, custody,  
 8 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
 9 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
 10 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
 11 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests  
 12 for Production No. 77.

13 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
 14 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
 15 this interrogatory.

16 **INTERROGATORY NO. 24:**

17 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
 18 the possibility of licensing (via collective license, blanket license, individual license, or any other  
 19 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

20 **RESPONSE TO INTERROGATORY NO. 24:**

21 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
 22 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First  
 23 Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory  
 24 requests information about third-parties. Plaintiff will limit her answer to her own conduct, not  
 25 the conduct of others.

26 Subject to and without waiving these and the general objections, based on Plaintiff's  
 27 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
 28 parties regarding licensing her Asserted Works for use in training LLMs.

not respond to this Interrogatory.

**INTERROGATORY NO. 27:**

Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether YOU contend it is a factual or creative work, and the target audience for the work.

**RESPONSE TO INTERROGATORY NO. 27:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

By: /s/ Mohammed A. Rathur

Mohammed A. Rathur

Bryan L. Clobes (pro hac vice)

Alexander J. Sweatman (pro hac vice)

Mohammed A. Rathur (pro hac vice)

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**VERIFICATION**

My name is Laura Lippman. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF LAURA LIPPMAN'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on 11/15/2024.



---

Laura Lippman

**BOIES SCHILLER FLEXNER LLP**

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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel included below]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Related Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S FOURTH SET OF  
INTERROGATORIES**



**RESPONSE TO INTERROGATORY NO. 23:**

Plaintiff objects to this Interrogatory to the extent that it is compound, premature, requests information over which Defendant has custody or control, and is duplicative. Each subpart is a separate Interrogatory, each of which counts separately toward Defendant's limit under the Federal Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory seeks documents and information over which Defendant has equal or greater possession, custody, and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use. Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's Request for Production No. 77.

Subject to and without waiving these and the general objections, Plaintiff is not obligated to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding this interrogatory.

**INTERROGATORY NO. 24:**

IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed the possibility of licensing (via collective license, blanket license, individual license, or any other licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

**RESPONSE TO INTERROGATORY NO. 24:**

Plaintiff objects to this Interrogatory to the extent it overbroad and duplicative. Plaintiff objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's Request for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory requests information about third-parties. Plaintiff will limit her answer to her own conduct, not the conduct of others. Plaintiff also objects to this request as unduly burdensome insofar it has no time

1 limitation.

2 Subject to and without waiving these and the general objections, based on Plaintiff's  
3 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
4 parties regarding licensing her Asserted Work for use in training generative AI.

5 **INTERROGATORY NO. 25:**

6 State all facts supporting any contention by YOU that the amount and substantiality of the  
7 portion of YOUR ASSERTED WORKS that was allegedly copied by Meta was not reasonable in  
8 relation to the purpose of training the META AI LLMs.

9 **RESPONSE TO INTERROGATORY NO. 25:**

10 Plaintiff objects to this Interrogatory to the extent that it is compound, premature, requests  
11 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
12 separate Interrogatory, each of which counts separately toward Defendant's limit under the  
13 Federal Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to  
14 the needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response  
15 that will be the subject of expert discovery and objects to the extent that this Interrogatory seeks  
16 the disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
17 seeks documents and information over which Defendant has equal or greater possession, custody,  
18 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
19 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
20 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
21 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's Request for  
22 Production No. 77.

23 Subject to and without waiving these and the general objections, Plaintiff is not obligated to  
24 and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding this  
25 interrogatory.

Dated: November 18, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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[continued on next page]

**VERIFICATION**

My name is Sarah Silverman. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF SARAH SILVERMAN'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on the 17 day of November, 2024.

DocuSigned by:

*sarah silverman*

EDDADCDCA0084AD...

Sarah Silverman

1 Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
2 Mohammed A. Rathur (pro hac vice)  
**CAFFERTY CLOBES MERIWETHER**  
3 **& SPRENGEL LLP**  
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4 Chicago, IL 60603  
Telephone: (312) 782-4880  
5 Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com  
6 mrathur@caffertyclobes.com  
7 *Counsel for Individual and Representative Plaintiffs and*  
*the Proposed Class*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**  
12

13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
corporation,

18 Defendant.  
19

Case No. 3:23-cv-03417-VC

PLAINTIFF RACHEL LOUISE SNYDER'S  
RESPONSES TO DEFENDANT'S FOURTH  
SET OF INTERROGATORIES

1 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
 2 separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal  
 3 Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the  
 4 needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that  
 5 will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the  
 6 disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
 7 seeks documents and information over which Defendant has equal or greater possession, custody,  
 8 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
 9 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
 10 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
 11 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests  
 12 for Production No. 77.

13 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
 14 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
 15 this interrogatory.

16 **INTERROGATORY NO. 24:**

17 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
 18 the possibility of licensing (via collective license, blanket license, individual license, or any other  
 19 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

20 **RESPONSE TO INTERROGATORY NO. 24:**

21 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
 22 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First  
 23 Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory  
 24 requests information about third-parties. Plaintiff will limit her answer to her own conduct, not  
 25 the conduct of others.

26 Subject to and without waiving these and the general objections, based on Plaintiff's  
 27 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
 28 parties regarding licensing her Asserted Works for use in training LLMs.

not respond to this Interrogatory.

**INTERROGATORY NO. 27:**

Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether YOU contend it is a factual or creative work, and the target audience for the work.

**RESPONSE TO INTERROGATORY NO. 27:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

By: /s/ Mohammed A. Rathur

Mohammed A. Rathur

Bryan L. Clobes (pro hac vice)

Alexander J. Sweatman (pro hac vice)

Mohammed A. Rathur (pro hac vice)

**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**

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[mrathur@caffertyclobes.com](mailto:mrathur@caffertyclobes.com)

**VERIFICATION**

My name is Rachel Louise Snyder. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF RACHEL LOUISE SNYDER'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on 11/18/2024.



Rachel Louise Snyder



1 Nada Djordjevic (admitted *pro hac vice*)

2 **DICELLO LEVITT LLP**

3 10 North Dearborn Street

4 6<sup>th</sup> Floor

5 Chicago, IL 60602

6 Tel.: (312) 214-7900

7 *ndjordjevic@dicellolevitt.com*

8 *Counsel for Plaintiffs and the Proposed Class, Additional*  
9 *Counsel Listed Below*

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
18 corporation,

19 Defendant.

Case No. 3:23-cv-03417-VC

PLAINTIFF LYSA TERKEURST'S  
RESPONSES TO DEFENDANT'S FOURTH  
SET OF INTERROGATORIES

20 PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

21 RESPONDING PARTY: PLAINTIFF LYSA TERKEURST

22 SET NO.: FOUR (4)

23 **INTRODUCTION**

24 Plaintiff Lysa TerKeurst hereby responds to Defendant Meta Platforms, Inc.  
25 ("Defendant") Fourth Set of Interrogatories, pursuant to Rules 26 and 33 of the Federal Rules of  
26 Civil Procedure.  
27  
28

1 seeks documents and information over which Defendant has equal or greater possession, custody,  
 2 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
 3 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
 4 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
 5 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's Request for  
 6 Production No. 77, as well as Interrogatory No. 16.

7 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
 8 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
 9 this interrogatory.

10 **INTERROGATORY NO. 24:**

11 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
 12 the possibility of licensing (via collective license, blanket license, individual license, or any other  
 13 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

14 **RESPONSE TO INTERROGATORY NO. 24:**

15 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
 16 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's Requests for  
 17 Production No. 15, and Second Requests for Production Nos. 34–35. Plaintiff further objects to  
 18 the extent this Interrogatory requests information about third-parties. Plaintiff will limit her  
 19 answer to her own conduct, not the conduct of others.

20 Subject to and without waiving these and the general objections, based on Plaintiff's  
 21 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
 22 parties regarding licensing her Asserted Work for use in training LLMs.

23 **INTERROGATORY NO. 25:**

24 State all facts supporting any contention by YOU that the amount and substantiality of the  
 25 portion of YOUR ASSERTED WORKS that was allegedly copied by Meta was not reasonable in  
 26 relation to the purpose of training the META AI LLMs.

27 **RESPONSE TO INTERROGATORY NO. 25:**

28 Plaintiff objects to this Interrogatory to the extent that it is compound, premature, requests

1  
2 UNITED STATES DISTRICT COURT  
3  
4 NORTHERN DISTRICT OF CALIFORNIA

5 RICHARD KADREY, SARAH  
6 SILVERMAN, CHRISTOPHER  
7 GOLDEN, TA-NEHISI COATES,  
8 JUNOT DÍAZ, ANDREW SEAN  
9 GREER, DAVID HENRY HWANG,  
10 MATTHEW KLAM, LAURA  
11 LIPPMAN, RACHEL LOUISE  
12 SNYDER, JACQUELINE WOODSON,  
13 AND LYSA TERKEURST,

14 *Individual and Representative*  
15 *Plaintiffs,*

16 v.

17 META PLATFORMS, INC.;

18 *Defendant.*

Case No. 3:23-cv-03417-VC

19 **VERIFICATION OF LYSA TERKEURST**

20 I, Lysa TerKeurst, hereby declare under oath that I have reviewed Plaintiff  
21 Lysa TerKeurst's Responses and Objections to the Fourth Set of Defendant's  
22 Interrogatories, and the statements of fact made therein are true and correct to the  
23 best of my knowledge based upon the information currently available to me. I  
24 declare under penalty of perjury under the laws of the United States of America that  
25 the foregoing is true and correct.

26 [signature on following page]

Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

Respectfully submitted,

By: /s/ James A. Ulwick

Amy Keller (admitted *pro hac vice*)

Nada Djordjevic (*pro hac vice*)

James A. Ulwick (*pro hac vice*)

Madeline E. Hills (*pro hac vice*)

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Executed on 11/18/2024 \_\_\_\_\_.

DocuSigned by:  
*Lysa TerKeurst*  
958C2F7C55BE4D7...

Lysa TerKeurst

1 Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
2 Mohammed A. Rathur (pro hac vice)  
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7 *the Proposed Class*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12  
13 RICHARD KADREY, *et al.*,

14 Individual and Representative  
15 Plaintiffs,

16 v.

17 META PLATFORMS, INC, a Delaware  
corporation,

18 Defendant.  
19

Case No. 3:23-cv-03417-VC

PLAINTIFF JACQUELINE WOODSON'S  
RESPONSES TO DEFENDANT'S FOURTH  
SET OF INTERROGATORIES

1 information over which Defendant has custody or control, and is duplicative. Each subpart is a  
 2 separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal  
 3 Rules. Plaintiff objects to this Interrogatory as unduly burdensome and disproportionate to the  
 4 needs of the case. Plaintiff objects to this Interrogatory to the extent that it seeks a response that  
 5 will be the subject of expert discovery and objects to the extent that this Interrogatory seeks the  
 6 disclosure of expert witness work product. Plaintiff also objects to the extent this Interrogatory  
 7 seeks documents and information over which Defendant has equal or greater possession, custody,  
 8 and control. Plaintiff objects that this request improperly shifts the burden of proof regarding fair  
 9 use in this case and thus Plaintiff need not respond. It is Defendant's burden of proof to show that  
 10 Defendant's use of the Asserted Works in connection with training any Meta AI LLM is fair use.  
 11 Plaintiff further objects to this Interrogatory to the extent it is duplicative of Meta's First Requests  
 12 for Production No. 77.

13 Subject to and without waiving these and the general objections, Plaintiff is not obligated  
 14 to and so will not respond to this interrogatory. Plaintiff is willing to meet and confer regarding  
 15 this interrogatory.

16 **INTERROGATORY NO. 24:**

17 IDENTIFY all THIRD PARTIES with whom YOU or YOUR AGENTS have discussed  
 18 the possibility of licensing (via collective license, blanket license, individual license, or any other  
 19 licensing system) any of YOUR ASSERTED WORKS as training data for LLMs.

20 **RESPONSE TO INTERROGATORY NO. 24:**

21 Plaintiffs object to this Interrogatory to the extent it over broad and duplicative. Plaintiff  
 22 objects that this Interrogatory is duplicative of Interrogatories Nos. 2, 12 and Meta's First  
 23 Requests for Production Nos. 15, 35–36. Plaintiff further objects to the extent this Interrogatory  
 24 requests information about third-parties. Plaintiff will limit her answer to her own conduct, not  
 25 the conduct of others.

26 Subject to and without waiving these and the general objections, based on Plaintiff's  
 27 preliminary investigation, Plaintiff has not entered into any individual negotiations with any third-  
 28 parties regarding licensing her Asserted Works for use in training LLMs.

not respond to this Interrogatory.

**INTERROGATORY NO. 27:**

Describe the nature of each of YOUR ASSERTED WORKS, including its genre, whether YOU contend it is a factual or creative work, and the target audience for the work.

**RESPONSE TO INTERROGATORY NO. 27:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

**INTERROGATORY NO. 28:**

State the total revenue that YOU (including any entity or company owned, operated, or controlled by YOU) have earned from each of YOUR ASSERTED WORKS, including revenues earned from sales and licensing of the works.

**RESPONSE TO INTERROGATORY NO. 28:**

The parties have not reached agreement, nor has the Court ordered additional Interrogatories beyond the twenty-five allowed by Fed. R. Civ. P. 33(a)(1). As such, Plaintiff will not respond to this Interrogatory.

Dated: November 18, 2024

By: /s/ Mohammed A. Rathur

Mohammed A. Rathur

Bryan L. Clobes (pro hac vice)

Alexander J. Sweatman (pro hac vice)

Mohammed A. Rathur (pro hac vice)

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[mrathur@caffertyclobes.com](mailto:mrathur@caffertyclobes.com)



**VERIFICATION**

My name is Jacqueline Woodson. I am one of the Plaintiffs in the action captioned *Kadrey et al. v. Meta Platforms, Inc.*, No. 3:23-cv-03417-VC. (N.D. Cal.).

I have reviewed the following document:

- **PLAINTIFF JACQUELINE WOODSON'S RESPONSES AND OBJECTIONS TO DEFENDANT META PLATFORM INC.'S FOURTH SET OF INTERROGATORIES**

I believe this document to be true and accurate with respect to statements based on my personal knowledge. Otherwise, I am informed and believe that the matters stated therein are true and correct.

I declare under penalty of perjury under the laws of the United States that these answers are true and correct. Executed on 11/18/2024.

*Jacqueline Woodson*

Jacqueline Woodson